

DECLARATION OF THOMAS P. VAN WAZER
Pursuant to 28 U.S.C. 1746

1. My name is Thomas P. Van Wazer. I am over 18 years of age and I am a citizen of the United States. I am a full time, salaried employee of the Federal Trade Commission (“FTC”) in Washington, D.C. My mailing address is 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. I have worked at the FTC since May 2010.

2. Since I started at the FTC in 2010, I have worked as a General Attorney – Forensic Accountant in the Bureau of Consumer Protection (“BCP”). In addition to my legal duties and responsibilities at the FTC, I provide forensic accounting assistance to BCP trial attorneys and investigators. I am a Registered Certified Public Accountant with the State of Illinois and a Certified Fraud Examiner. I hold a Certificate in Forensic Accounting from the Georgetown University School of Continuing Studies and a Juris Doctor from the Georgetown University Law Center where I graduated *magna cum laude*. I also have a Bachelor of Science degree in Economics from the University of Pennsylvania where I graduated from the Wharton School of Business with concentrations (majors) in Accounting and Finance.

3. In my capacity as a forensic accountant, I was asked to review and analyze bank records from JP Morgan Chase, N.A. (“Chase”) and Bank of America (“BofA”) for EMP Media, Inc. (“EMP Media”), including records for accounts nominally held in the name of companies that EMP Media was doing business as (d/b/a). I understand that these bank records were produced in response to Civil Investigative Demands issued by the FTC. The EMP Media accounts I reviewed and analyzed are set forth below (hereinafter the “Analyzed Accounts”).

The accounts are listed in the following format: name of account holder; bank; last four digits of account number; and time period analyzed.

EMP Media, Inc.; Bank of America x2477; 1/2014 to 4/2016

EMP Media, Inc. d/b/a Internet Secrets; Bank of America x3162; 1/2014 to 4/2016

EMP Media, Inc. d/b/a Post My Ad; Bank of America x4532; 8/2015 to 3/2016

EMP Media, Inc. d/b/a T&A Media; Bank of America x4672; 7/2014 to 3/2016

EMP Media, Inc.; JPMorgan Chase x4540; 12/2011 to 12/2012

I note that my analysis did not include any banking records for 2013. My understanding is that the case team did not receive any 2013 bank records from EMP Media and did not independently identify any EMP Media bank accounts for 2013.

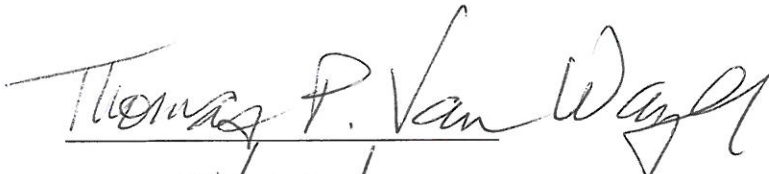
4. To conduct this analysis, I used, where appropriate, the Comprehensive Financial Investigations System ("CFIS"), a financial investigation tool from Actionable Intelligence Technologies, Incorporated. I understand that CFIS is utilized by a number of U.S. government agencies/organizations, including the Internal Revenue Service, the Federal Bureau of Investigation, the Organized Crime Drug Enforcement Task Force, and a number of U.S. Attorney's offices. Among other things, CFIS uses proprietary technology to convert bank statements from financial institutions into a database that can be searched, analyzed and used to generate a variety of reports and tables. CFIS reports and tables can easily be converted to Microsoft Excel format.

5. In the instant matter, I uploaded and then processed the account statements from BofA and Chase in CFIS. I then reconciled the bank statement information in CFIS with the information in the statements produced by the banks to ensure the accuracy of the information in

CFIS. Once the reconciliation process was complete, I used basic query functions in CFIS to run reports that, *inter alia*, identified the total deposits into the Analyzed Accounts as well as the sources of those deposits. I then converted these reports into Microsoft Excel for further analysis.

6. Between December 2011 and June 2016 (excluding 2013), a total of \$6,600,295 was collectively deposited into the Analyzed Accounts. Of this total, \$5,915,430.51 was deposited into the Analyzed Accounts from non-affiliated sources. The term non-affiliated sources indicates that I have removed any transfers between EMP Media d/b/a accounts from the overall deposit total to avoid double counting. A list of the entities that deposited money into the Analyzed Accounts, ranked from largest to smallest, is attached hereto as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct.


Date: 5/24/18

| Source of Funds | Amount |
|---|--------------|
| BANKCARD Total | 2,077,251.97 |
| AMERICAN EXPRESS Total | 639,993.92 |
| Deposit Total | 545,732.73 |
| MONERIS Total | 310,515.80 |
| ONLINK ATM LLC Total | 288,000.00 |
| HOT TRAFFIC NETWORK LLC Total | 278,196.83 |
| WEB TRAFFIC NETWORKS LLC Total | 238,097.59 |
| Lakeview Accounting Services Total | 235,500.00 |
| CYBERTANIA INC Total | 164,100.00 |
| JDI DATING LIMITED Total | 163,450.00 |
| EX SITU MARKETING INC Total | 155,435.00 |
| CYTEK LIMITED Total | 119,865.00 |
| BANG MEDIA GROUP B.V. Total | 94,255.00 |
| BMO HARRIS NA Total | 85,838.74 |
| MEDLEY.COM INC. Total | 76,950.00 |
| DATA INFO CORE INC Total | 73,554.45 |
| MARCUS J BACHRACK INC Total | 62,125.00 |
| PLOT TRAFFIC NETWORK Total | 60,000.00 |
| DARKSIDE PRODUCTIONS INC Total | 50,000.00 |
| AVID DATING LIFE INC Total | 46,342.59 |
| BEACH SOFTWARE DEVELOPMENT Total | 40,000.00 |
| GROT IT PTY LTD Total | 18,950.00 |
| CHINA BANKING CORP Total | 16,000.00 |
| BLUERIVER GROUP LIMITED Total | 10,000.00 |
| Wire In Total | 8,000.00 |
| ALIGNED ACQUISITIONS Total | 7,500.00 |
| KRISHNA M KANT Total | 7,500.00 |
| ROBERT A WISER Total | 6,442.06 |
| Check Card Purchase Return Total | 4,761.29 |
| GODADDY.COM Total | 4,523.16 |
| CHRISTOPHER KZEMBA Total | 4,000.00 |
| PAYPAL Total | 3,989.00 |
| Returned Withdrawal/Debit Total | 3,400.00 |
| Credit Due To Debit Card Dispute Total | 2,863.92 |
| WELLS FARGO BANK NA Total | 2,460.00 |
| HOTELS.COM Total | 2,113.40 |
| OPULENT LIFESTYLE LLC Total | 2,000.00 |
| KRISHNA KANT FSM MOTORS Total | 1,500.00 |
| Internet Check Card Purchase Return Total | 1,197.28 |
| Keynetics Payables Total | 1,047.59 |
| ADP Total | 881.28 |
| WWW.MARK.COM Total | 577.03 |
| CITIBANK NA Total | 189.95 |
| TROPICANA LAS VEGAS NV Total | 167.01 |
| BKCD PROCESSING Total | 162.92 |
| | 5,915,430.51 |